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March 7, 2016

**VIA, ELECTRONIC FILING**

Joseph Melchers, Esquire,  
General Counsel,  
The Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: • Docket Number 2015-362-E  
• SC Solar Development, LLC  
• **Request to Carry Over Agenda Item**

Dear Mr. Melchers:

The undersigned is counsel of record for SC Solar Development, LLC, (hereinafter as, "SC Solar"), approved as an Intervenor by this Commission in the Docket referenced above. Because of the nature of this Docket, this Commission did not set a date to receive Testimony or Comments from an Intervenor. Accordingly, SC Solar hereby provides Comments as follows.

The Office of Regulatory Staff (hereinafter as, "ORS"), and various parties held discussions concerning approval of a New Interconnection Standard in South Carolina, in this Docket and reached a consensus. This consensus was evidenced by correspondence from ORS to this Commission dated February 26, 2016, supporting this Commission's approval of the Joint Application, as filed in this Docket.

However, SC Solar did not participate in those discussions and SC Solar is in disagreement with omissions from the Joint Application. Namely, there is no differentiation between Small Generator Projects and Large Generator Projects, with a 1 MW Project being “treated” the same as an 80 MW Project. Also, important provisions normally found in a Large Generator Interconnection Procedure (“LGIP”) and Agreements (“LGIA”) are not available in the proposed standard. For example, under the FERC form LGIP, large generators are able to suspend the project for up to three years. The proposed standard provides no ability for a large generator to suspend the project. Additionally, the FERC form LGIP requires the utility reimburse the interconnection customer for system upgrade costs paid by customer, the proposed standards contains no such requirement.

Each regulated utility’s current OATT differentiates between large and small generators in alignment with FERC’s small generator and large generator interconnection forms. As a result, this proposed standard is materially worse for large generators as compared to the current interconnection standards. This is adverse to the interests of the South Carolina rate payers as they are less likely to benefit from the potential savings available from cost competitive large generators.

In order for this Commission to receive and review SC Solar’s Comments, and receive and review responses from the Joint Applicants and ORS, SC Solar respectfully request that this Commission carry over this matter, until such time as all Comments are received and reviewed. During this time frame, there may be other Intervenors who wish to comment on this very important matter and carrying over this item from this Wednesday, March 9, 2016 Agenda session, will allow other Intervenors to participate.

Respectfully Submitted,

/S/ \_\_\_\_\_  
Richard L. Whitt